PLEADING TITLE - 2

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LEGAL RELEVANCE TO THE CASE

1. Supports First and Fourteenth Amendment Claims

- Demonstrates that WCLS actively coordinated programming and messaging with a
 private advocacy organization (Drag Story Hour Inc.).
- Confirms viewpoint-based selection of programs and exclusion of alternative perspectives, violating the First Amendment's prohibition on viewpoint discrimination (Rosenberger v. Rector, 515 U.S. 819 (1995)).
- Shows that WCLS relied on Drag Story Hour Inc. for public relations guidance, event structuring, and censorship policies.

2. Reinforces BOC's State Actor Status

- Strengthens the argument that BOC was closely tied to WCLS programming and event planning, reinforcing BOC's state actor liability under Lugar v. Edmondson Oil Co.,
 457 U.S. 922 (1982).
- Proves that BOC was directly involved in planning and coordinating Drag Story Hour events, demonstrating joint action with WCLS.

3. Relevant to Monell Liability

Establishes that WCLS leadership, including Jeff Scott and Beate Weinert, made
discretionary decisions favoring Drag Story Hour Inc. over other community programs,
making Washoe County liable under Monell v. Dept. of Social Services, 436 U.S. 658
(1978).

PLEADING TITLE - 3

Proves that WCLS was not neutral but actively advanced a specific agenda in coordination with private organizations. **CERTIFICATION OF AUTHENTICITY** I, Drew J. Ribar, hereby certify under penalty of perjury under the laws of the United States and the State of Nevada that the attached Exhibit 7 is a true and correct copy of the original record as obtained from public records and discovery disclosures, and that it has been prepared for submission in this case in accordance with the Federal Rules of Evidence 901 and 902. Dated: March 17, 2025 /s/ Drew J. Ribar Drew J. Ribar, Pro Se 3480 Pershing Ln Washoe Valley, NV 89704 (775) 223-7899 Const2Audit@gmail.com PLEADING TITLE - 4

From:

Weinert, Beate < BWeinert@washoecounty.gov>

Sent:

12 January 2023 02:13

To:

Scott, Jeff

Cc:

Hansen, Judy; Hemingway, Jamie

Subject:

Follow up from Drag Story Hour mtg + resources Re: Drag Story Hour Sample Letters

Attachments:

Hello Jeff—pardon lengthy email but wanted to make sure we captured all pertinent details!

Judy, Jamie, and I just met with Jonathan Hamilt with Drag Story Hour <a href="https://www.dragstoryhour.org/ in preparation of WCLS becoming a local chapter.

Home | Drag Story Hour

Drag Story Hour events are happening all over the world at libraries, schools, bookstores, museums, summer camps, afterschool programs, and other community spaces!

www.dragstoryhour.org

As we work through this with DSH, our immediate next step is to meet with Our Center to plan this summer's all day Pride event to include a few Drag Story Hours. We were thinking about possibly folding into the Northern Nevada Pride event. If it's ok, I'm going to respond to the email you initiated back in November with Our Center to get things moving along.

We also discussed possibly contacting other local Drag Story Hour presenters about joining the Reno Chapter, and options for offering Story Time training.

Staff training/support was emphasize, with Jamie suggesting a session at May's Staff Day. Here are a couple of possible presenters and resources from Jamie: For the Staff Day Training portion--funny enough, a friend of mine named Kyle Weiss just reached out to me today about possibly doing LBTQIA+ Awareness Presentations for the library system. He's a Project Outreach Manager at TMCC, and giving presentations to build awareness of LGBTQIA+ issues is his specialty. His work is grant funded, and his focus is on awareness and education for Nevada workers and organizations. He is aware of recent issues with our Drag Queen Story Time, and wanted to reach out to potentially offer us some training.

He reached out to me right after our meeting. Crazy timing. Anyway, I'm still in talks with him about what all that might entail, but it could work really well with our idea for a debriefing/staff day training.

Oh and one more idea for debriefing---another friend of mine named Ali Szarko could be helpful for facilitating debriefing/constructive sharing of feelings, etc. Here's an event she put on for the Holland Project:

https://www.facebook.com/events/the-holland-project/psychology-of-self-love-workshop-w-al i-szarko/226500874764699/

I just saw this on Holland's website yesterday when I was browsing their calendar, which Ali is presenting next month:

https://www.hollandreno.org/event/self-love-workshop/

Self Love Workshop - The Holland Project

It's time for another Self Love Workshop! Ali Szarko, M.A. (doctoral candidate in psychology from UNR) will lead participants in a 3-hour experiential training on the "self" and the steps we can take on a daily basis to be more loving of that ever changing person.

www.hollandreno.org

Additionally, Jonathan shared a number of useful suggestions when hosting a DSH, including keeping a close eye on the metrics, distributing a survey to attendees, and facilitating a debrief for all involved immediately following the event.

DSH is also working on establishing a volunteer Shields Up Royal Guard Safety Marshall team and will be providing access to various trainings. More to come on these.

We also mentioned what's been happening at LBOT. Jonathan shared the following, including the below email:

EXHO28

Group Agreements: Read books, not colleagues. This is a safe space. Don't yuck my "I'd like to have a conversation about yum. Oops/ Ouch. Put it in the Parking Lot. that""Nudge is love". Any other agreements to add?

With Much Gratitude, Beate

Beate Weinert

Youth Services and Library Events Manager | Washoe County Library System bweinert@washoecounty.gov | Office: 775.327.8361 301 S. Center Street, Reno, NV 89501

From: Jonathan Hamilt <jonathan@dragstoryhour.org>

Sent: Wednesday, January 11, 2023 11:46 AM

Judy <JHemingway@washoecounty.gov>; Hansen, Jamie Hemingway, <JHansen@washoecounty.gov>; Weinert, Beate <BWeinert@washoecounty.gov>

Subject: Drag Story Hour Sample Letters

[NOTICE: This message originated outside of Washoe County -- DO NOT CLICK on links or open attachments unless you are sure the content is safe.]

Below are sample letters that libraries may wish to use to respond to patrons who have questions or concerns about DSH as well as some FAQS. I know the canned letters are geared towards library readings but you can certainly use the language for your events!

Please advise to delete, block, report, and document all online and phone call threats.

If you would live to chat, I am more than happy to schedule a call with you as well.

I hope this relieves some of the pressure. I just remember that you are doing AMAZING work and with the very few people that have an issue with it, you know you are doing something right! Dear Thank you for taking the time to express your views on Drag Queen Story Hour. [Our] Public Library serves a very diverse population, and we know that not every program will meet with the approval of every potential patron. We do our best to provide clear information about all of our programs for children and families, so that parents and caregivers may choose for themselves which they wish to attend. There is a large and appreciative audience for Drag Queen Story Hour and other activities that encourage self-acceptance, discourage teasing and bullying, and make reading a joyful communal experience. Many families have expressed their enthusiasm and gratitude for the program. We feel that Drag Queen Story Hour serves a need in the community, and will continue to offer it. Thank you again for your interest in [our] Public Library. -OR-Dear ____:

Thank you for taking the time to express your views about our library program Drag Queen Story Hour. We serve a very diverse population in [our city], and we know that every program will not meet with the approval of every potential patron. We try to provide clear information on our programs so people can make informed choices on which programs to attend, especially when they are attending with young children. Those of us who work with young children on a regular basis know that children can dress and act in a variety of ways, and supporting their choices builds self-confidence and can help avoid serious problems later in life. By creating an atmosphere of acceptance, and reading stories about acceptance of differences, we are hoping to stave off teasing and bullying. No one who has attended one of our Drag Queen Story Hour programs has ever complained or been unhappy, and many parents have thanked us for offering this program. I am sure you are aware that many people have different views from those you expressed in your message. [Our] Public Library offers a huge number of traditional Story Times presented by our children's librarians; Drag Queen Story Hour comprises just a tiny fraction of all the programs we offer for children. There is an appreciative audience for this program, as the attendance has shown, and we feel we are serving a community need by offering it.

Thank you again for your interest in [our] Public Library.

And here are some FAQs to have on hand as well:

Is this program appropriate for children?

DSH is designed for children aged 3-8. Drag queens trained by children's librarians

read children's books, sing children's songs, and lead children in craft activities.

Should children be exposed to issues like gender fluidity?

Many children express gender fluidity. DSH teaches children to embrace gender diversity in themselves and in others, and helps to curb bullying of LGBTQ children and kids who may be perceived as different in all kinds of ways.

Isn't this confusing for children? What if the children have questions and I don't know how to answer them?

There are many things in the world that are confusing. Adults don't always have all the answers, but we can ask questions and learn together. A great place to start is Sez Me, a free LGBTQ web series for the whole family. We also recommend looking at resources from organizations like Gender Spectrum, GLSEN, and PFLAG, as well as local LGBTQ groups.

What is a drag queen?

Drag is an artistic way of expressing yourself and showing the world who you are or who you want to be. Drag queens often express their feminine sides or different aspects of their gender or personality through dressing up, performing, marching in parades, and volunteering in their communities. There are drag queens, drag kings, drag princes, and drag princesses—anyone can be any of the above, regardless of how they identify in everyday life! All that matters is that, when you dress up, you feel comfortable and

Should I call the drag queen "he," "she," "they," or something else?

You can ask! It's always OK to ask someone what their pronouns are. Examples of pronouns are "she," "he," and "they." Some people have different pronouns at different times, like when they are in drag and out of drag. Others have the same pronouns all the time.

Does DQSH promote an agenda?

Our agenda is simple: we believe that people of all ages should be free to express themselves however they want, free from the constraints of prescribed gender roles. In other words, there's no such thing as "girl clothes" and "boy clothes," or "girl toys" and "boy toys." DSH teaches children that there are many ways to express themselves and their gender, and they are all OK. Of course, drag is an art form that is rooted in diverse LGBTQ communities, and we support equality, justice, and respect for all people—for us, that's just a given. Given that LGBTQ people are present in every community, we believe that children deserve to be exposed to these aspects of our shared history and culture, in age appropriate ways. Any insinuation that we have an agenda to indoctrinate children misunderstands LGBTQ experiences and is rooted in homophobia and transphobia.

Why is DQSH necessary?

DSH helps children develop empathy, learn about gender diversity and difference, and tap into their own creativity. DSH can also be life-changing and ultimately life-saving for LGBTQ kids and teens, kids with LGBTQ parents or family members, and anyone who feels different because of their identity or interests or who may not otherwise see themselves reflected in the broader culture.

LGBTQ-positive programs like DQSH are a vital part of making the world a safe and affirming place for all children. LGBTQ children need role models, and all children should learn to embrace gender diversity and learn empathy.

EXHO31

Fabulously Yours, Jonathan Hamilt Executive Director

he/him/his 770-403-5460 dragstoryhour.org